

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf  
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND  
ORDER FOR APPOINTMENT OF A  
SPECIAL MASTER

ELIZABETH DE COSTER, *et al.*, on behalf of  
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The Parties submit this Proposed Order pursuant to the Court's Order selecting a Special Master, establishing the Special Master's authority, and establishing a protocol for raising privilege disputes. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220. Accordingly, the Parties, and their respective counsel, hereby stipulate and agree, and request an order establishing the following:

1. The Court APPOINTS the Honorable Elizabeth D. Laport (Ret.) as the Special Master in these matters.
2. The Special Master will file a declaration under 28 U.S.C. § 455 confirming there are no grounds for disqualification.
3. The Special Master's authority, and other provisions of the Special Master process, are set forth in the Court's Order of July 7, 2025. Case No. 21-693, Dkt. # 381; Case No. 20-424, Dkt. # 352; Case No. 22-965, Dkt. # 220.

IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

DATED July 9, 2025.

Respectfully submitted,

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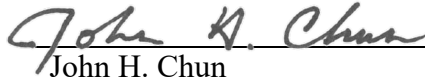
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1 IT IS SO ORDERED.

2  
3 July 9, 2025

4 Dated



John H. Chun

United States District Judge